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[Additional Attorneys For Plaintiff Listed on Following Page]
Attorneys for Plaintiff

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ALAMEDA**

THE PEOPLE OF THE STATE OF
CALIFORNIA, by the Attorney General, the
California Corporations Commissioner, and the
District Attorneys of Los Angeles, Alameda,
San Francisco, San Mateo, Monterey, and
Merced Counties,

Plaintiff,

v.

AMERIQUEST MORTGAGE COMPANY, a
Delaware corporation; ACC CAPITAL
HOLDINGS CORPORATION, a Delaware
corporation; TOWN AND COUNTRY
CREDIT CORPORATION, a Delaware
corporation; and AMC MORTGAGE
SERVICES, INC., formerly known as Bedford
Home Loans, a Delaware corporation,

Defendants.

**ENDORSED
FILED
ALAMEDA COUNTY**

MAR 21 2006

CLERK OF THE SUPERIOR COURT
By Alphonse Oates, Deputy

Case No.: **RG06260804**

**STIPULATION FOR ENTRY OF
PERMANENT INJUNCTION AND
FINAL JUDGMENT AND
[PROPOSED] ORDER**

1 ADDITIONAL COUNSEL FOR PLAINTIFF:

2 STEVE COOLEY, District Attorney
County of Los Angeles
3 THOMAS A. PAPAGEORGE (Ca. Bar No. 77690)
Head Deputy District Attorney
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STIPULATION

Plaintiff the People of the State of California, by the Attorney General, the California Corporations Commissioner, and the District Attorneys of Los Angeles, Alameda, San Francisco, San Mateo, Monterey, and Merced Counties (collectively, "Plaintiff" or the "People"), appearing through Attorney General Bill Lockyer, by Benjamin Diehl; Acting California Corporations Commissioner Wayne Strumpfer, by Judy Hartley; Alameda County District Attorney Thomas J. Orloff, by Lawrence C. Blazer; Los Angeles County District Attorney Steve Cooley, by Stuart C. Lytton; Merced County District Attorney Gordon Spencer, by Richard S. Michaels; Monterey County District Attorney Dean D. Flippo, by Denine Guy; San Francisco City and County District Attorney Kamala D. Harris, by June D. Cravett; and San Mateo County District Attorney James P. Fox, by John E. Wilson, on the one hand, and Defendants Ameriquest Mortgage Company, ACC Capital Holdings Corporation, Town and Country Credit Corporation, and AMC Mortgage Services, Inc., appearing through Kirkpatrick & Lockhart Nicholson Graham LLP, by Ronald W. Stevens on the other hand, hereby stipulate as follows:

1. This Court has jurisdiction of the subject matter hereof and the parties hereto.
2. The Permanent Injunction and Final Judgment ("Judgment"), a true and correct copy of which is attached as Exhibit 1, may be entered by a judge or commissioner of the Alameda County Superior Court.
3. Plaintiff and Defendants hereby waive their right to move for a new trial or otherwise seek to set aside the Judgment through any collateral attack, and further waive their right to appeal from the Judgment, except that Plaintiff and Defendants, and each of them, agree that this Court shall retain jurisdiction for the purposes specified in paragraph VIII.H of the Judgment.
4. Defendants submit to the jurisdiction of the Superior Court of California, County of Alameda solely for purposes of entry of this judgment and for any action by Plaintiff or by any of the Defendants hereto regarding the construction, carrying out, modification, enforcement, or punishment for any violation of any provision of the Judgment.

1 5. All signatories to this Stipulation on behalf of Plaintiff and Defendants
2 specifically represent that they have been authorized by the Party(ies) on behalf of whom they are
3 signing to enter into this Stipulation for Entry of Permanent Injunction and Final Judgment.

4 6. Defendants will accept notice of entry of judgment entered in this action by
5 delivery of such notice to their counsel of record, and agree that service of the notice of entry of
6 judgment will be deemed personal service upon them for all purposes.

7 7. The People acknowledge that Defendants deny all allegations of wrongdoing
8 raised by Plaintiff and that Defendants cooperated with the Settling States' investigations and
9 examinations of the Lending Practices, as that term is defined in the Judgment.

10 8. By stipulating to the Entry of Judgment, Defendants are not admitting any
11 wrongdoing, or the truth of any allegations raised by Plaintiff.

12 9. This Stipulation may be executed in counterpart, and a facsimile signature shall be
13 deemed to be, and shall have the same force and effect as, an original signature.

14 IT IS SO STIPULATED:

15 For Plaintiffs:

16 DATED: March 16, 2006

BILL LOCKYER
Attorney General
ALBERT NORMAN SHELDEN
Senior Assistant Attorney General

18 By:

19 BENJAMIN G. DIEHL
Deputy Attorney General

20 DATED: March 16, 2006

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24 JUDY L. HARTLEY
Senior Corporations Counsel

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18 By:

19 ~~JOHN E. WILSON~~
Deputy District Attorney In Charge,
Consumer & Environmental Protection Unit

21 FOR DEFENDANTS:

22 DATED: March __, 2006

23 RONALD W. STEVENS
Kirkpatrick & Lockhart Nicholson Graham, LLP

24 By:

25 ~~RONALD W. STEVENS~~
Attorneys for Defendants Ameriquest Mortgage
Company; ACC Capital Holdings Corporation;
Town and Country Credit Corporation; and AMC
Mortgage Services, Inc.

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